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BY E.C.F. AND BY E-MAIL

Honorable Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: Jaenean Ligon, et. al. v. City of New York, et al., 12 Civ. 2274 (AT)(HBP)

Your Honor:

We are Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. In response to plaintiffs' letter of November 20, 2013, defendants simply note that they read the Second Circuit's November 1, 2013 Corrected Mandate to stay only the proceedings related to the preliminary injunction in the above-referenced matter, and not discovery, which has been ongoing without interruption following the preliminary injunction granted by the Honorable Shira A. Scheindlin, U.S. District Judge, in January 2013. Defendants can certainly understand, however, plaintiffs' contrary reading in light of the broad wording of the Corrected Mandate. Further, defendants do not dispute, under all of the circumstances, that it would make sense to stay all proceedings pending the outcome of the appeal.

In the event that the Court disagrees, and finds that a stay of discovery is not warranted, however, defendants respectfully submit that plaintiffs have not adequately explained why they need a 60-day extension of discovery, as only 27 days of discovery remained when the Corrected Mandate was issued.

Defendants thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/

Heidi Grossman
Mark D. Zuckerman
Brenda Cooke
Joseph Marutollo

cc: Alexis Karteron, Esq. (by E.C.F.)